

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
SOUTHERN DIVISION**

Crystal Long

Plaintiff,

v.

Pendrick Capital Partners II, LLC, et al.

Defendants.

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\*  
\*  
\*  
\*  
\*

Case No.: 8:17-cv-01955-GJH

**SECOND DECLARATION OF INGMAR GOLDSON, ESQ.**

I, Ingmar Goldson, Esq., pursuant to Fed. R. Civ. P. 56(e)(4) hereby declare:

1. I am a member in good standing of the bar of the State of Maryland. I am the principal at The Goldson Law Office, LLC, and am counsel for Plaintiff Crystal Long in this matter.

2. I submit this declaration in support of Plaintiff's Summary Judgment Reply Brief, based on my personal knowledge of the facts and events of this case.

3. Attached hereto as Exhibit 1 is a true and correct copy of an interest rate notification received by Plaintiff Crystal Long. This document was produced to counsel for Pendrick and Ability on February 22, 2018, and the contents of the document were disclosed to counsel before that date.

4. Attached hereto as Exhibit 2 is an affidavit signed by Plaintiff Crystal Long on May 7, 2018.

5. Attached hereto as Exhibit 3 is [REDACTED]

[REDACTED] email received by Crystal Long on May 24, 2017. The

contents of this email was forwarded to counsel for Ability by email on July 10, 2017.

6. Attached hereto as Exhibit 4 is a true and correct copy of Plaintiff Crystal Long's responses to Ability's Interrogatories.

7. Attached hereto as Exhibit 5 is a true and correct copy of the Plaintiff Crystal Long's additional responses to Pendrick's Interrogatories. These responses were sent to counsel for Pendrick and Ability on December 28, 2017.

8. Attached hereto as Exhibit 6 is a true and correct copy of the Plaintiff Crystal Long's responses to Experian's Interrogatories. These responses were sent to counsel for Pendrick and Ability on December 28, 2017.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 7<sup>th</sup> day of May, in Silver Spring, Maryland

 5/7/2018  
Ingmar Goldson, Esq.

# Exhibit 1

< Inbox



From: Mint >



To: Crystal Long >

Hide

## Interest rate change on Chase Bank credit card

Yesterday at 8:29 PM



### Your credit card interest rate went up

The interest rate on your account CHASE SLATE changed by 0.25% from 27.99% to 28.24%. Your current balance is \$1,470.85.

Contact Chase Bank to see why.  
Go to <https://www.chase.com/>. Or apply for a card with a lower interest rate.



# Exhibit 2

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
SOUTHERN DIVISION**

Crystal Long	*	
	*	
Plaintiff,	*	Case No.: 8:17-cv-01955-GJH
	*	
v.	*	
	*	
Pendrick Capital Partners II, LLC, et al.	*	
	*	
Defendants.	*	
	*	

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**AFFIDAVIT OF CRYSTAL LONG**

I, Crystal Long, affirm the following:

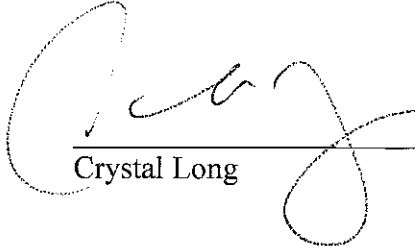
1. I am over 18 years of age and competent to testify about the matters contained herein.
2. All information contained herein is based on my personal knowledge.
3. As a direct result of Ability attempting to collect the false debt, and Ability reporting the false Pendrick debt to Experian, Equifax, and Transunion, I experienced anxiety that resulted in sleepless nights, and at times the anxiety would result in an "anxiety attack" where I would feel a wave of nausea and a rapid heart rate. I felt this type of anxiety attack (with nausea and rapid heart rate) after I saw the email and checked my credit to see the false debt being reported. As months went by and I saw that Ability continued reporting the false debt, despite my many disputes, I would get headaches with pulsating temple pain. The headaches came after I checked my credit, and when I thought about the financial impact of the false credit reporting. I had difficulty sleeping right after the credit

reporting started, when I thought about the economic impact that the false credit reporting has made in my life. The thoughts that sparked the anxiety and sleeplessness included financial planning around the false reporting, purchases that would normally be on credit, my inability to purchase a new car with a low interest rate that I worked hard for (with good credit), and my inability to remodel my home with a low interest rate that I worked hard for (with good credit).

4. I did not apply for credit while the Ability account was listed on my credit report because I knew I was likely to be denied, or offered credit with a higher interest rate than I deserved, and I did not want an unnecessary inquiry on my credit to lower my score further.
5. I am now waiting to resolve this case before applying for additional credit.

I solemnly affirm under the penalties of perjury that the contents of the foregoing are true to the best of my knowledge, information, and belief.

Dated: May 7, 2018

  
Crystal Long

# Exhibit 3



**DOCUMENT REDACTED**

# Exhibit 4

**DOCUMENT REDACTED**

# Exhibit 5

**DOCUMENT REDACTED**

# Exhibit 6

**DOCUMENT REDACTED**